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*Counsel to the Ad Hoc Committee of Senior
Unsecured Noteholders of Pacific Gas and
Electric Company*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)

(Jointly Administered)

**DECLARATION OF CECILY A. DUMAS
IN SUPPORT OF EX PARTE MOTION OF
THE OFFICIAL COMMITTEE OF TORT
CLAIMANTS AND AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS PURSUANT TO B.L.R.
9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING
ON JOINT MOTION TO TERMINATE
THE DEBTORS' EXCLUSIVE PERIODS**

[No hearing requested]

1 I, Cecily A. Dumas, pursuant to 28 U.S.C. § 1746, declare the following under penalty of perjury:

2 1. I am a Partner at Baker & Hostetler LLP ("Baker & Hostetler"), which has an office
3 at 160 Battery Street, San Francisco, California 94111 and is an independent, privately-held, legal
4 firm. I am authorized to make this declaration (this "Declaration") on behalf of Baker & Hostetler.
5 Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

6 2. Baker & Hostetler was engaged as counsel to the Official Committee of Tort
7 Claimants (the "TCC") effective as of February 2019. I lead a team of Baker & Hostetler
8 professionals on this engagement. I submit this Declaration in support of the Ex Parte *Motion of*
9 *the Official Committee of Tort Claimants and Ad Hoc Committee of Senior Unsecured Noteholders*
10 *Pursuant to B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Joint Motion to*
11 *Terminate the Debtors' Exclusive Periods Pursuant to Section 1121(d)(1) of the Bankruptcy Code*
12 (the "Motion").¹

13 3. Except where specifically noted, all statements in this Declaration are based upon
14 (a) my personal knowledge developed during the course of my engagement with the TCC, (b) my
15 discussions with advisors of other parties in interest in these chapter 11 cases and other members
16 of my team at Baker & Hostetler and (c) my review of relevant documents and/or my professional
17 opinion based upon my experience. If called to testify, I could and would testify to each of the
18 facts set forth herein based on such personal knowledge, discussions, review of documents and/or
19 professional opinion.

20 4. On September 19, 2019, I conferred with Stephen Karotkin ("Mr. Karotkin"),
21 counsel for Pacific Gas and Electric Company (the "Utility") and PG&E Corporation ("PG&E")
22 and, together with the Utility, the "Debtors", regarding whether the Debtors would consent to
23 notice being shortened on the *Joint Motion of the Official Committee of Tort Claimants and Ad Hoc*
24 *Committee of Senior Unsecured Noteholders to Terminate the Debtors' Exclusive Periods Pursuant*
25 *to Section 1121(d)(1) of the Bankruptcy Code* [Docket No. 3940]. Mr. Karotkin informed me that
26 the Debtors would not consent to any hearing being scheduled on shortened time with respect to
27 the Motion.

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¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

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Dated: San Francisco
September 19, 2019

/s/ Cecily A. Dumas
Cecily A. Dumas